

REMARKS

Claims 1-4 and 7-20 remain pending for consideration, with Claims 1 and 11 being independent.

Claims 1 and 11 have been amended to change “the small-diameter portion” to --the small-diameter portions--, thereby addressing and overcoming the rejection under 35 U.S.C. § 112, second paragraph.

Applicants have also amended Claims 1 and 11 to clarify that the gap formed at the small-diameter portions between the pair of folding rollers is not only smaller than the thickness of the sheet as folded, but may be equal to the thickness of the sheet as folded. This latter amendment is presented so the claim reads on embodiments such as that specifically disclosed on page 33, lines 16-21 of the specification.

Applicants wish to express their appreciation for the courtesies extended to Applicants’ representative during a personal interview held with the Examiner on December 16, 2004. At the interview, the Examiner’s rejection of independent Claims 1 and 11 over Click (U.S. Patent No. 3,576,051) was discussed, and Applicants’ representative sought to explain how the pending claims distinguished over Click.

Applicants representative explained that the present claims were limited to a sheet folding apparatus (Claim 1) or image forming apparatus which contains a sheet folding apparatus (Claim 11) and that the sheet folding apparatus of each claim included a pair of folding rollers. Click is not directed to a sheet folding apparatus and does not disclose sheet folding rollers. Instead, Click is directed to an apparatus used to flatten a blown thermoplastic film and the Click device uses flattening rollers which do not fold that film. Moreover, there is no folding

thermoplastic film in Click, and even if the rollers in Click were characterized as folding rollers, the gap between rollers at the small-diameter portions is not smaller than or equal to the thickness of the sheet as folded. Applicants' representative referred the Examiner to column 4, lines 70-72 of the specification, which discloses that depths of the depressions at the small-diameter portions are 5 to 20 times the thickness of the film being produced and that therefore the gap formed at the small-diameter portions between the pair of flattening rollers in Click is substantially larger than the thickness of the sheet as folded.

The apparatus in Click has nothing to do with folding rollers, but was designed to address a problem in prior art thermoplastic film blowing. In that prior art, as shown in Figure 6, when a conventional flattening apparatus having conventional continuous surfaced nip rolls are used, creased edges 39 at each side edge of the flattened film will appear. When the film is then expanded to a tubular film (as shown in Fig. 8) those creased edges become indentations 41 in the tubular film and those indentations are weak spots. By leaving a large gap at the edge of the film, the apparatus in Click allows two parallel edge cushions 35 of thermoplastic material to remain inflated with a small portion of the gaseous material used (see, Fig. 5) and when the film is expanded into a tubular form, as illustrated in Fig. 7, a tubular member is created without indentations.

Accordingly, it is clear that Click does not meet the language of Claims 1 or 11; nor is Click even directed to a sheet folding apparatus or to the folding rollers utilized in the present invention.

The secondary citation to Branecky was cited against dependent Claims 7, 8, 10, 16, 17, and 19 and this patent relates to grooved paper folding rollers. Branecky does not


meet the shortcomings of Click. In Branecky the grooves of one roller are offset with respect to the grooves of the other roller. Since the grooves are being offset with each other they make a closed space. There is no gap and thus there is no relief from folding pressure as created by the gap in Applicants' claimed invention. As a result, Branecky still generates creases as in the prior art.

Thus, reconsideration and withdrawal of the rejection of Claims 7, 8 and 10 under 35 U.S.C. § 103, is respectfully requested.

Accordingly, it is submitted that Applicants' invention as set forth in independent Claims 1 and 11 is patentable over the cited art. In addition, dependent Claims 2-4, 7-10 and 12-20 set forth additional features of Applicants' invention. Independent consideration of the dependent claims is respectfully requested.

Applicants' undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 530-1010. All correspondence should continue to be directed to our below listed address.

Respectfully submitted,



Lawrence A. Stahl
Attorney for Applicants
Registration No. 30,110

FITZPATRICK, CELLA, HARPER & SCINTO
30 Rockefeller Plaza
New York, New York 10112-3801
Facsimile: (212) 218-2200

LAS:cyw

DC_MAIN 187973v1